



MCI Telecommunications  
Corporation  
1801 Pennsylvania Avenue, NW  
Washington, DC 20006

ORIGINAL

December 22, 1994

RECEIVED

DEC 22 1994

Mr. William Caton  
Acting Secretary  
Federal Communications Commission  
Room 222  
1919 M Street, NW  
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Re: RM - 8540; In the Matter of US WEST Access Billing  
Requirements for Joint Service Provision  
Petition for Rulemaking

Dear Mr. Caton:

Enclosed herewith for filing are the original and four (4)  
copies of MCI Telecommunications Corporation's Reply  
Comments regarding the above-captioned matter.

Please acknowledge receipt by affixing an appropriate  
notation on the copy of the MCI Reply Comments furnished for  
such purpose and remit same to the bearer.

Sincerely,

Christopher Bennett  
Analyst

No. of Copies rec'd  
List A B C D E

054

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

RECEIVED

DEC 22 1994

In the Matter of: )  
 )  
US WEST ) RM - 8540  
Access Billing Requirements )  
for Joint Service Provision )  
 )  
 )  
 )

**REPLY COMMENTS**

MCI respectfully submits its reply comments in response to the comments filed by petitioners in the matter of US WEST's Access Billing Requirements for Joint Service Provision.<sup>1</sup> MCI is aware of comments from Ameritech,<sup>2</sup> BellSouth,<sup>3</sup> and Sprint<sup>4</sup> and will address each in turn.

Support for US WEST rulemaking petition is conspicuous in its absence. Ameritech, as a peer LEC, argues in favor of the single bill requirement, instead of corroborating US WEST's claims about the difficulties of implementing single

---

<sup>1</sup> In the Matter of Access Billing Requirements for Joint Service Provision, RM - 8540, filed November 1, 1994, (US WEST Rulemaking Petition).

<sup>2</sup> [Comments of Ameritech] In the Matter of Access Billing Requirements for Joint Service Provision, RM - 8540, filed December 7, 1994 (Ameritech Comments).

<sup>3</sup> [BellSouth Comments on Petition for Rulemaking of US WEST] In the Matter of Access Billing Requirements for Joint Service Provision, RM - 8540, filed December 7, 1994 (BellSouth Comments).

<sup>4</sup> [Sprint Opposition to Petition for Rulemaking] In the Matter of Access Billing Requirements for Joint Service Provision, RM - 8540, filed December 7, 1994 (Sprint Opposition).

bill requirement agreements with coordinating LECs.<sup>5</sup> MCI reemphasizes its contention that US WEST's failure to meet the Commission's decision, in favor of implementing the single bill requirement, is due to US WEST's own sloth, and not due to unmanageable circumstances. Reasonably diligent LECs have successfully met the Commission's single bill requirement.

MCI believes Sprint's comments are complementary to MCI's opposition to US WEST's rulemaking petition.<sup>6</sup> In particular, both Sprint and MCI have determined that the Commission has directed the LECs to implement the single bill requirement but, given them the alternative of qualifying to implement the multiple bill option if they meet a three-part test set forth by the Commission.<sup>7</sup> Also, Sprint's comments augment MCI's rebuttal<sup>8</sup> of US WEST's claim that interexchange carriers (IXCs) would not be hurt.<sup>9</sup> Specifically, Sprint points out the complications and shortcomings of multiple billing compared to the single bill

---

<sup>5</sup> Ameritech Comments, p. 1. Ameritech asks the Commission "...not to prohibit single bill arrangements where the participating carriers are agreeable."

<sup>6</sup> Sprint Opposition, pp. 2 - 7.

<sup>7</sup> Id.

<sup>8</sup> See [MCI Opposition] In the Matter of Access Billing Requirements for Joint Service Provision, RM - 8540, filed December 7, 1994 (MCI Opposition).

<sup>9</sup> Id.

option. Sprint's arguments are in concert with the arguments made in the MCI Ex-Parte.<sup>10</sup>

The Commission's three-part test for implementing the multiple bill option is relevant to BellSouth's comments.<sup>11</sup> While BellSouth and Sprint apparently disagree on the Commission's interpretation of the appropriate test a LEC must pass to implement the multiple bill option instead of the single bill requirement, the substantial and fact intensive showing the Commission set for allowing a LEC not to implement the single bill requirement is undisputed.<sup>12</sup> Any LEC that has not demonstrated to the Commission that it has met that showing must have the single bill requirement in place by the Commission's deadline. Because of the different interpretations of the Commission's three-part test for LEC selection of the multiple bill option, MCI asks that the Commission clarify its position when it rules on US WEST's rulemaking petition.

MCI continues to ask the Commission deny US WEST's petition for a rulemaking. Nothing new has been presented to support US WEST's claims and the paucity of evidence US

---

<sup>10</sup> See Sprint Opposition, pp. 3 - 4. See also MCI Ex-Parte, infra. note 12., p. 2.

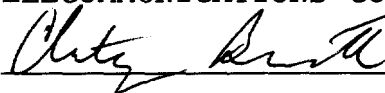
<sup>11</sup> See Sprint Opposition. See also BellSouth Comments.

<sup>12</sup> See MCI Opposition Petition. See also letter from Donald F. Evans, MCI Director of Federal Regulatory Affairs, Docket #87-579; In the Matter of US WEST Access Billing Requirements for Joint Service Provision Waiver, filed December 7, 1994 (MCI Ex-Parte).

WEST has presented fails to justify a rulemaking.

Respectfully submitted,

MCI TELECOMMUNICATIONS CORPORATION

BY: 

Christopher Bennett

Analyst

1801 Pennsylvania Avenue, NW

Washington, DC 2006

(202) 887-2402

Dated: December 22, 1994

STATEMENT OF VERIFICATION

I have read the foregoing, and to the best of my knowledge, information, and belief there is good ground to support it, and that it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct.

Executed on December 22, 1994.

A handwritten signature in cursive script, appearing to read "Chris Bennett", is written over a horizontal line.

Christopher Bennett  
Analyst  
1801 Pennsylvania Avenue, NW  
Washington, DC 2006  
(202) 887-2402

**CERTIFICATE OF SERVICE**

**I, Barbara Nowlin, do hereby certify that copies of the foregoing Reply Comments were sent via first class mail, postage paid, to the following on this 22nd day of December 1994.**

**Kathleen Wallman\*\*  
Chief, Common Carrier Bureau  
Federal Communications Commission  
Room 500  
1919 M Street, N.W.  
Washington, DC 20554**

**Kathleen Levitz\*\*  
Federal Communications Commission  
Room 500  
1919 M Street NW  
Washington, DC**

**Geraldine Matisse\*\*  
Acting Chief, Tariff Division  
Federal Communications Commission  
Room 518  
1919 M Street, N.W.  
Washington, DC 20554**

**Ann Stevens\*\*  
Federal Communications Commission  
Room 518  
1919 M Street, N.W.  
Washington, DC 20554**

**David Nall \*\*  
Deputy Chief, Tariff Division  
Federal Communications Commission  
Room 518  
1919 M Street, NW  
Washington, DC 20554**

**Judy Nitsche\*\*  
Federal Communications Commission  
Room 514  
1919 M Street, NW  
Washington, DC 20554**

**Peggy Reitzel \*\*  
Federal Communications Commission  
Room 544  
1919 M Street, NW  
Washington, DC 20554**

**ITS\*\*  
Federal Communications Commission  
1919 M Street NW  
Washington, DC 20554**

**James Hannon  
US WEST, Inc.  
1020 19th Street, N.W. - Suite 700  
Washington, DC 20036**

**C. Scott McClellan  
U S West Communications, Inc.  
1801 California Street  
Room 4750  
Denver, Colorado 80202**

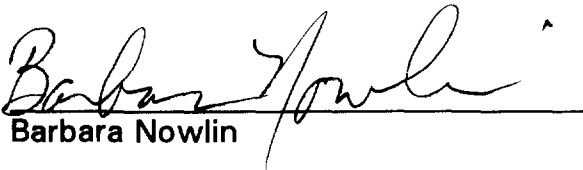
**Ms. Cyndie Eby  
U S West, Inc.  
1020 19th Street N.W. - Suite 700  
Washington, DC 20036**

**Michael S. Pabian  
Attorney for Ameritech  
Room 4H76  
2000 West Ameritech Center Drive  
Hoffman Estates, IL 60196 - 1025**

**Normina T. Moy  
Michael B. Fingerhut  
Sprint Communications Company  
1850 M St., N.W. - Suite 110  
Washington, DC 20036**

Rebecca M. Lough  
Mr. Robert Sutherland  
Richard M. Sbaratta  
BellSouth Telecommunications, Inc.  
4300 Southern Bell Center  
675 West Peachtree Street, N.E.  
Atlanta, GA 30375

**Hand Delivered\*\***

  
Barbara Nowlin